

FILED

APR 14 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE ALFREDO VELAZQUEZ, et al.,

Defendants.

No. S3-4:15 CR 404 HEA (NAB)

FILED UNDER SEAL

MOTION TO SEAL

COMES NOW the United States of America, by and through the United States Attorney for the Eastern District of Missouri, Richard G. Callahan, and Michael A. Reilly, Assistant United States Attorney for said District, and states the following:

The Government hereby requests that this matter, S3-4:15CR404 HEA/NAB, be sealed until arrest warrants may be executed in this matter. The Government anticipates that the arrest warrants will be executed on or about April 15, 2016.

On February 18, 2016, the grand jury returned the second superseding indictment that charged twenty-one defendants with multiple offenses including homicides, firearms offenses, drug distribution conspiracies, and other drug related offenses. Multiple deaths resulted from the homicides and firearms violations charged in the previous indictments. Most of the charged individuals are detained pending trial. Approximately four individuals are on bond; two individuals have absconded and are not in custody.

The Grand Jury has returned a third superseding indictment charging six additional defendants with a violation of Title 21, United States Code, Section 846, for conspiracy to distribute five kilograms or more of cocaine. These six recently added defendants are subject to a

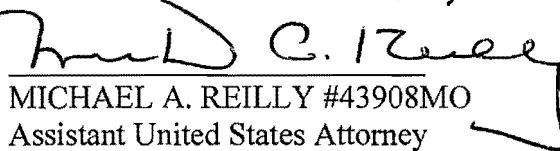
ten year mandatory minimum sentence.

As grounds for its request that the indictment be sealed until additional defendants are taken into custody on April 15, 2016, the Government states that due to the nature of the charges, there is an extreme danger to the arresting agents officers and to the community were the third superseding indictment to become public prior to the initial "round up." The investigation reveals that most of the newly added defendants have engaged in violent crime and/or firearms possession. Moreover, each of the six additional defendants presents a substantial flight risk.

The Government requests that the initial appearance of the defendants who were originally charged in the second superseding indictment be delayed until after the initial round up for the third superseding indictment is executed on April 15, 2016. This delay is minimal, and in all likelihood, would fall within the window of what is reasonably necessary to transport the already detained defendants to court for their initial appearance on the third superseding indictment.

Respectfully submitted,

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